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*Attorneys for Plaintiff,  
Bionpharma, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BIONPHARMA INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	1:21-cv-10656
	)	
CORERX, INC.,	)	
	)	
Defendant.	)	
	)	

**NOTICE OF MOTION TO SEAL**

**PLEASE TAKE NOTICE** that the above-named Plaintiff, Bionpharma, Inc. (“Bionpharma” or “Plaintiff”), by and through its attorneys, Holland & Knight LLP, moves to file specific portions of Plaintiff Bionpharma’s Brief in Support of Motion for Preliminary Injunction, (ii) specific portions of the Declaration of Venkat Krishnan in support of Plaintiff’s Motion for Preliminary Injunction, (iii) specific portions of Exhibits F, I, J, L, M, N, and O to the Declaration of Venkat Krishnan, and (iv) specific portions of the Declaration of Marisa Marinelli, Esq. in Support of Plaintiff Bionpharma’s Application for Order to Show Cause with Temporary Restraints, and Motion for Preliminary Injunction under seal.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Plaintiff relies on the accompanying Memorandum of Law in Support of its Motion to Seal. A proposed Order granting the relief requested is also submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff will lodge unredacted copies of the aforementioned documents with the Court and will file redacted copies with this Motion.

DATED: December 13, 2021

**HOLLAND & KNIGHT LLP**

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